

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

FINANCIAL RESOURCES FEDERAL CREDIT  
UNION,

Plaintiff,

vs.

ALLOYA CORPORATE FEDERAL CREDIT  
UNION, DIEBOLD NIXDORF AND DIEBOLD  
INCORPORATED, J.P. MORGAN CHASE  
BANK, LOOMIS ARMORED, INC., BRINKS  
COMPANY, DUNBAR ARMORED, ABC  
CORPS. #1-5,

Defendants.

Civil Action No.: 20-cv-06180-FLW-  
DEA

**NOTICE OF MOTION**

To: Daniel R. Bevere, Esq.  
Todd M. Galante, Esq.  
Piro, Zinna, Cifelli, Paris & Genitempo, LLC  
360 Passaic Avenue  
Nutley, NJ 07110  
*Attorneys for Plaintiff*

**PLEASE TAKE NOTICE** that defendants The Brink's Company, incorrectly sued as "Brinks Company" ("Brink's"), and Brink's, Incorporated, as successor in interest to Dunbar Armored, Inc., incorrectly sued as "Dunbar Armored" ("Dunbar" and, collectively with Brink's, the "Brink's Defendants"), will move before the Hon. Freda L. Wolfson, U.S.C.D.J., at a time and date to be set by the Court, for an Order granting the Brink's Defendants' Motion to Dismiss Plaintiff's Amended Complaint for failure to state a claim upon which relief can be granted pursuant to Federal Rule of Civil Procedure 12(b)(6).

**PLEASE TAKE FURTHER NOTICE** that, in support of its motion, the Brink's Defendants shall rely on the Memorandum of Law submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted with this motion.

Dated: Princeton, New Jersey  
July 27, 2020

/s/ Joseph N. Froehlich  
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*Attorneys for Defendants The Brink's Company  
and Brink's, Incorporated, as successor in  
interest to Dunbar Armored, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that, on July 27, 2020, I caused the attached Notice of Motion, Memorandum of Law in support thereof, and proposed Order, to be served on all parties entitled to notice by filing with the Clerk of the Court using the Court's CM/ECF system.

/s/ Joseph N. Froehlich  
Joseph N. Froehlich, Esq.